Dear Chairman Carr,

On behalf of KFXK-TV (FOX51-Tyler, TX), I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of all local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KFXK/FOX51 produces 19+ hours of local programming each week. Not just Local News but Community Affairs programming like our *In Focus* program (that focuses on one issue each week, like the need for rural broadband service). We also have the longest running high school sports coverage program (*Overtime)* in East Texas. We have always had a strong commitment to Community Service at KFXK/FOX51. KFXK was started in 1984 by Clara McLaughlin and is the first Black woman-owned TV station in the USA. Local charities receive a large amount of airtime to help those who need help in our communities. KFXK's local news plays a significant role in alerting our viewers and covering major local events like tornadoes, flooding and other lifesaving coverage. We work hard to serve our local communities, support local business and help those who need it most. Our ties to our community are deep and are the corner stone of our mission to serve East Texas.

As you know local newspapers and radio stations have either had to dramatically decrease their coverage of local issues or go out of business altogether. Often this results in a national footprint of content that does NOT serve our local communities. The antiquated FCC regulations that have no real relevance to current marketplace conditions are constantly hurting our ability to serve our local market. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers depend on daily.

When the current ownership caps/rules were originally put in place the media landscape was very different. The need to promote competition and diversity in the media is no longer needed due to the new streaming technology we now have in every market. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KFXK/FOX51 are at a distinct disadvantage. The obvious constraints of the broadcast cap are punitive when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their unrestricted Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality is that the extreme neglect and lack of attention to this issue over time has led to the unrestricted growth of Big Tech and while we have been squeezed to the point where our options to continue to operate in a manner that affords the public the service, they have become accustomed to and deserve are in jeopardy. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Ward L Huey
KFXK/FOX51
4300 Richmond Rd
Tyler, TX 75703
whuey@KETK.com
903-279-0800